
EXHIBIT 3

James A. Cooper, Ph.D.

May 11, 2023

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF TEXAS
WACO DIVISION

THE TRUSTEES OF PURDUE
UNIVERSITY,

Plaintiff,

vs. Civil Action No. 6:21-CV-00727-ADA

STMICROELECTRONICS
INTERNATIONAL N.V. and
STMICROELECTRONICS, INC.,

Defendants.

VIDEOTAPED DEPOSITION OF JAMES A. COOPER, Ph.D.

May 11, 2023

8:02 a.m.

100 Sandoval Street
Santa Fe, New Mexico

PURSUANT TO THE FEDERAL RULES OF CIVIL
PROCEDURE, this deposition was:

TAKEN BY: MR. MIKE BETTINGER
Attorney For Defendants

REPORTED BY: Peggy Jo Gonzales, RMR, CCR #145
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Professional Court Reporting Service
201 Third Street, Northwest, Suite 1630
Albuquerque, New Mexico 87102

(8287N-PJ)

May 11, 2023

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I N D E X

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1 Q. Have you at any point in time -- regarding
2 your research going back decades, have you at any
3 point in time intended to deceive anyone regarding
4 your research?

5 A. No, absolutely not.

6 Q. Counsel showed you Exhibit 49, this
7 integrity and research document.

8 A. Right.

9 Q. Now, you testified that you hadn't seen
10 this before, correct?

11 A. Correct.

12 Q. Do you need a document to tell you to have
13 integrity in your research?

14 A. No, I don't.

15 Q. Have you always had integrity in your
16 research, Dr. Cooper?

17 A. Yes, I have.

18 Q. Have you always attempted to maintain
19 integrity in your research?

20 A. Yes.

21 Q. Earlier you testified -- let me ask you
22 this. I think you mentioned earlier that you cannot
23 perform diffusion in silicon carbide?

24 A. That's correct.

25 Q. Why not?

1 A. It's a different material. It's much more
2 robust than silicon, and impurities just do not
3 diffuse in silicon carbide at any reasonable
4 temperature. And by "reasonable temperature," I mean
5 a temperature that's low enough it wouldn't melt the
6 semiconductor. Actually, the semiconductor doesn't
7 melt, it sublimes. But at any processing temperature
8 that's feasible, you -- the impurities do not move.

9 MR. LAHAD: I've got no further questions
10 for you, Dr. Cooper, okay.

11 THE WITNESS: Okay.

12 EXAMINATION

13 BY MR. BETTINGER:

14 Q. Just one follow-up. You mentioned metadata
15 on your computer.

16 A. Correct.

17 Q. What's -- what are you talking about?

18 A. It's a create- -- data that identifies the
19 creation date of a file. It's --

20 Q. That comes with the file, or is that
21 created on your computer, or what --

22 A. It's -- when the file is placed on the
23 computer, the date and, I think, time that it's
24 placed on the computer is -- is encoded by the
25 operating system.

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CERTIFICATE OF COMPLETION OF VIDEOTAPED DEPOSITION

I, PEGGY JO GONZALES, New Mexico CCR #145, DO
HEREBY CERTIFY that on May 11, 2023, the deposition
of JAMES A. COOPER, Ph.D. was taken before me at the
request of, and sealed original thereof retained by:

Attorney for the Defendants
MR. MIKE BETTINGER
SIDLEY AUSTIN, LLP
555 California Street
San Francisco, California 94104
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I FURTHER CERTIFY that copies of this
certificate have been mailed or delivered to all
Counsel, and parties to the proceedings not
represented by counsel, appearing at the taking of
the deposition:

I FURTHER CERTIFY that examination of this
transcript and signature of the witness was requested
by the witness and all parties present.

On _____ a letter was mailed or delivered to
MR. JOHN P. LAHAD regarding obtaining signature of
the witness.

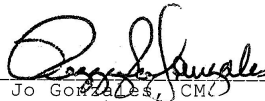
May 11, 2023

1 I FURTHER CERTIFY that the recoverable cost of
2 the original and one copy of the deposition,
3 including exhibits, to MR. MIKE BETTINGER is
4 \$_____.

5 I FURTHER CERTIFY that I did administer the oath
6 to the witness herein prior to the taking of this
7 deposition; that I did thereafter report in
8 stenographic shorthand the questions and answers set
9 forth herein, and the foregoing is a true and correct
10 transcript of the proceeding had upon the taking of
11 this deposition to the best of my ability.

12 I FURTHER CERTIFY that I am neither employed by
13 nor related to nor contracted with (unless excepted
14 by the rules) any of the parties or attorneys in this
15 case, and that I have no interest whatsoever in the
16 final disposition of this case in any court.

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Peggy Jo Gonzales, CMR

Peggy Jo Gonzales, RMR, CCR #145
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Professional Court Reporting Service
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(8287N-PJ)
Date Taken: May 11, 2023
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